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7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR 10-919 CW
11)
12 Plaintiff,) **STIPULATION AND ~~PROPOSED~~**
13 v.) **ORDER MODIFYING IN-DISTRICT**
14 JULIE MATAU, AND ANDREA MATAU,) **BOND CONDITION PRIOR TO**
15 Defendants,) **SENTENCING DATE**
Court: The Honorable Donna Ryu

16
17 The parties hereby stipulate and agree as follows:

- 18 1. This matter is set for sentencing on March 27 at 2:30 p.m.;
- 19 2. Defendants Julie Matau and Andrea Matau hereby request permission to travel out
20 of the district prior to March 27, for the purpose of visiting relatives in Southern
21 California and Nevada prior to their sentencing date;
- 22 3. Defendants Julie Matau and Andrea Matau thus request this Court to modify the
23 bond condition requiring them to remain in the Northern District of California
24 between March 20 and March 26, 2012, to allow for travel throughout the state of
25 California and to the state of Nevada;
- 26 4. In so requesting a stay of that bond condition, defendants Julie and Andrea Matau

1 hereby attest that they will 1) provide Pretrial Services with an itinerary of their
2 trip, including the method and mode of transportation, proposed dates of travel,
3 and the locations they anticipate visiting, 2) keep in telephone contact with U.S.
4 Pretrial Services on a daily basis while out of the district, and provide all location
5 and contact information daily, and 3) cooperate with Pretrial Services by
6 providing any and all additional information requested by that agency regarding
7 their travel plans, travel locations, and contact information while traveling.

8 5. United States Pretrial Services Officer Joshua Libby has been consulted regarding
9 this stipulation. As indicated by his signature below, he has no objection to the
10 proposed modification provided that the defendants promise to comply and do
11 comply with the aforementioned conditions stated in Paragraph 4, above;

12 6. The government has also been consulted about this request. As indicated by the
13 signature below, there is no opposition to the proposed modification.

14 IT IS SO STIPULATED.

15 Dated: March 20, 2012

16
17 _____/S/
ELIZABETH M. FALK
18 ASSISTANT FEDERAL PUBLIC DEFENDER
Attorney for Julie Matau

19 Dated: March 20, 2012

20 _____/S/
JOSHUA COHEN
21 Attorney for Andrea Matau

22 Dated: March 20, 2012

23 _____/S/
EDWARD JOSEPH LOYA JR.
24 U.S. Department of Justice
Public Integrity Section, Criminal Division

1 Dated: March 20, 2012

_____/S/_____
2

JOSHUA LIBBY

3 U.S. Pretrial Services Officer.

4 **[PROPOSED] ORDER**

5 For the reasons set forth above, the bond conditions of Julie and Andrea Matau are hereby
6 modified between March 20, 2012 and March 26, 2012 as follows:

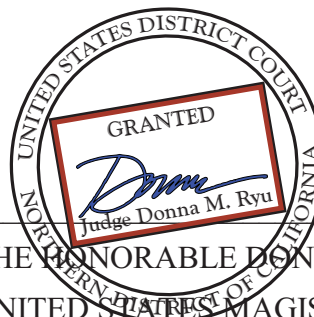
7 1. The condition requiring the defendants to remain in the Northern District of California
8 is hereby MODIFIED to include and allow travel within the entire state of California (including
9 the Central, Southern, and Eastern Districts of California) and the state of Nevada (District of
10 Nevada);
11

12 2. Defendants Julie Matau and Andrea Matau are required, as a condition of this
13 modification, to 1) provide Pretrial Services with an itinerary of their trip, including the method
14 and mode of transportation, proposed dates of travel, and the locations they anticipate visiting, 2)
15 keep in telephone contact with U.S. Pretrial Services on a daily basis while out of the district, and
16 provide all location and contact information daily, and 3) cooperate with Pretrial Services by
17 providing any and all additional information requested by that agency regarding their travel
18 plans, travel locations, and contact information while traveling;
19

20 3. This modification of bond will terminate on March 26, 2012, The defendants will be
21 required to return to the district by March 26, 2012 and remain here thereafter.

22 **IT IS SO ORDERED.**

23
24
25 DATED: 3/23/2012



26 THE HONORABLE DONNA RYU
UNITED STATES MAGISTRATE JUDGE